THE HONORABLE JAMES L. ROBART 1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 HONEYWELL INTERNATIONAL, INC., a Delaware corporation, INTERMEC, INC., a No. 2:14-cy-00283-JLR 11 Delaware corporation, and INTERMEC TECHNOLOGIES CORPORATION, a MOTION TO SEAL REGARDING 12 Washington corporation, SUPPLEMENTAL DECLARATION OF PAUL RASKIN 13 Plaintiffs. 14 NOTE ON MOTION CALENDAR: v. 15 **September 26, 2014** DR. PAUL MALTSEFF. f/k/a Pavel Maltsev, an individual, 16 Defendant. 17 18 The Supplemental Declaration of Paul R. Raskin filed by Dr. Maltseff in connection with 19 his pending Motion to Compel and For Further Relief Re: Discovery submits as Exhibit A a copy 20 of Plaintiffs' answer to Dr. Maltseff's Interrogatory No. 8. Plaintiffs have designated a portion of 21 that answer as Highly Confidential - Attorney's Eyes Only under the Protective Order in this case. 22

Dr. Maltseff therefore files this motion to seal to give Plaintiffs an opportunity to support their claim that this answer contains highly confidential information that should be restricted from public view.

MOTION TO SEAL RE: SUPPLEMENTAL DECLARATION OF PAUL RASKIN - 1 No. 2:14-cv-00283-JLR

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Dr. Maltseff files this motion in an abundance of caution and as a courtesy to Plaintiffs. 1 Plaintiffs have the burden of establishing that the information should be sealed and presumably 2 3 will seek to do so in response to this motion. Dr. Maltseff questions whether the information constitutes confidential information that should be filed under seal and reserves the right to reply to 4 5 that response. DATED this 11th day of September, 2014. 6 7 CORR CRONIN MICHELSON **BAUMGARDNER & PREECE LLP** 8 9 s/ Paul R. Raskin William F. Cronin, WSBA No. 8667 10 Paul R. Raskin, WSBA No. 24990 1001 Fourth Avenue, Suite 3900 11 Seattle, WA 98154-1051 (206) 625-8600 Phone 12 (206) 625-0900 Fax wcronin@corrcronin.com 13 praskin@corrcronin.com Attorneys for Defendant 14 15 16 17 18 19 20 21 22 23 24 25

CERTIFICATE OF SERVICE 1 I hereby certify that on September 11, 2014, I electronically filed the foregoing with the 2 Clerk of the Court using the CM/ECF system, which will send notification of such filing to the 3 following: 4 Louis David Peterson Randall E. Kahnke 5 Michael J. Ewart Kerry L. Bundy Hillis Clark Martin & Peterson P.S. Martin S. Chester 6 1221 Second Avenue, Suite 500 Tyler Young 7 Seattle, WA 98101-2925 Ryan Long ldp@hcmp.com Faegre Baker Daniels LLP 8 mje@hcmp.com 2200 Wells Fargo Center Attorneys for Plaintiffs 90 South Seventh Street 9 Minneapolis, MN 55402-3901 randall.kahnke@faegrebd.com 10 kerry.bundy@faegrebd.com 11 martin.chester@faegrebd.com tyler.young@faegrebd.com 12 ryan.long@faegrebd.com Attorneys for Plaintiffs 13 14 DATED this 11th day of September, 2014. 15 16 s/ Paul R. Raskin Paul R. Raskin, WSBA No. 24990 17 CORR CRONIN MICHELSON BAUMGARDNER & PREECE LLP 18 1001 Fourth Avenue, Suite 3900 19 Seattle, Washington 98154-1051 (206) 625-8600 Phone 20 (206) 625-0900 Fax praskin@correronin.com 21 22 23 24 25

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